

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION**

---

<b>In Re:</b>	)	
	)	
<b>JUNE NOELLE WILLIAMS</b>	)	
	)	<b>Chapter 13</b>
	)	<b>Case No. 24-11123-JEB</b>
<b>Debtor</b>	)	
	)	

---

**DEBTOR'S RESPONSE TO  
ORDER TO SHOW CAUSE (ECF DOC #76)**

Now comes, June-Noelle Williams, (“Debtor”) by and through undersigned counsel, Glenn F. Russell, Jr., and who herein respectfully files her Response to this Court’s Order of January 02, 2025 to Show Cause why this matter should not be dismissed for unreasonable delay.

The Court correctly identified that the Chapter 13 Trustee’s principal Objections concerned the failure to provide accurate information regarding her income, included information on her schedules that is inconsistent with her Section 341 testimony, and failed to provide information [regarding income] to the Trustee. In support of the Debtor’s position, the undersigned will state the reasons for the present situation below.

Undersigned states that he has reached out and discussed the fact with the Trustee’s Office that apparently the Debtor’s husband failed to disclose to the Debtor that he was, in fact, still receiving social security disability income, as well as social security benefits for both of the Debtor’s children. The preceding caused the discrepancy between the Debtor’s 341 testimony and her schedules. In fact, the Debtor’s husband affirmatively

disavowed any continued receipt of said income, and therefore the Debtor's testimony failed to reflect this fact.

Undersigned has attempted to acquire the Trustee's requested information, which necessarily is dependent upon cooperation from the Debtor's husband, which has taken some time to receive, and to which has unfortunately caused the unanticipated delay in transmitting the same to the Trustee. Undersigned, has [since this Court's January 02, 2025 Order] sent evidence of the Debtor's husband's income as a van driver to the Trustee via the Trustee's document portal. The undersigned has further sent documentary indicia regarding the Debtor's husband's 2023 Social Security 1099 for himself and one of his two children and is still awaiting receipt of the 2023 Social Security 1099 for the second child.

The undersigned sincerely apologizes for mis-calendaring the last hearing in this matter and responded to the Chapter 13 Trustee's email regarding the same, to apologize for such error and to state that he was aghast at such omission, and also to confirm that the undersigned would present the Amended Plan for the Trustee's review prior to filing the same. Undersigned, in fact, did follow this Court's directive, and submitted the Amended Plan to the Trustee for review, who provided further guidance after review of the same.

Undersigned prays for this Court's understanding, as apparently there may exist marital issues between the Debtor and her husband that has caused the Debtor to lack scienter regarding the entirety of the entire present financial picture of her household. The preceding also required the undersigned to rely upon production of documents from the non-filing spouse, which therefore caused the delay in conveying the same to the Trustee.

Undersigned, intends to have filed the Debtor's Amended Plan, Amended

Schedule I [along with Motions for the same], to conform with this Court's January 02, 2025 Order.

WHEREFORE, the Debtor, by and through her counsel, Glenn F. Russell, Jr., respectfully prays for the Court's understanding regarding the particular issues and fact pattern presented in this matter and further prays that the Court take into consideration the fact that the Debtor relies upon information that was never disclosed to her and that apparently was solely in possession of the non-filing spouse.

Respectfully submitted,

Attorney for the Debtor

/s/ Glenn F. Russell, Jr.  
Glenn F. Russell, Jr.  
BBO: 656914  
38 Rock Street, Suite #12  
Fall River, MA 02720  
(888) 400-9318  
[russ45eq@gmail.com](mailto:russ45eq@gmail.com)

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

---

In Re: )  
 )  
**JUNE-NOELLE WILLIAMS** )  
 ) Chapter 13  
 )  
**Debtor** ) Case No. 24-11123-JEB  
 )  
 )

---

CERTIFICATE OF SERVICE

I, Glenn F. Russell, Jr., do hereby certify that on the 14<sup>th</sup> day of January 2025, I served the Debtors' Response to the Court's January 02, 2025 Order to Show Cause, to the following parties via electronic mail and submission to the ECF System, and/or by USPS postage prepaid to the following:..

*Assistant U.S. Trustee*  
**John Fitzgerald**  
Office of the US Trustee  
J.W. McCormack Post Office & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

*Trustee*  
Carolyn Bankowski  
Ch 13-12 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114  
617-723-1313

**AmeriCredit Financial Services, Inc.**  
**dba GM Financial**  
PO Box 183853  
Arlington, TX 76096

**Brock and Scott, PLLC**  
Attorneys at Law  
3825 Forrestgate Dr.  
Winston-Salem, NC 27103

**Capital One**  
PO Box 31293  
Salt Lake City, UT 84131-0293

**Capital One**  
Attn: Bankruptcy  
PO Box 30285  
Salt Lake City, UT 84130-0285

**Capital One**  
Attn: Bankruptcy  
PO Box 30  
Salt Lake City, UT 84130-0285

**Credit One Bank**  
PO Box 98872  
Las Vegas, NV 89193-8872

**Credit One Bank**  
Attn: Bankruptcy Department  
6801 S Cimarron Rd  
Las Vegas, NV 89113-2273

**Fortiva**  
PO Box 105555  
Atlanta, GA 30348-5555

**Fortiva**  
Attn: Bankruptcy  
PO Box 105555  
Atlanta, GA 30348-5555

**Genesis Fs Card Services**  
Attn: Bankruptcy  
PO Box 4477  
Beaverton, OR 97076-4401

**Genesis Fs Card Services**  
PO Box 4499  
Beaverton, OR 97076-4499

**Global Lending Services LLC**

Attn: Bankruptcy  
PO Box 10437  
Greenville, SC 29603-0437

**Global Lending Services LLCAL**

1200 Brookfield Blvd  
Ste 300  
Greenville, SC 29607-6583

**Gm Financial**

Attn: Bankruptcy  
PO Box 183853  
Arlington, TX 76096-3853

**Gm Financial**

PO Box 181145  
Arlington, TX 76096-1145

**LVNV Funding, LLC**

Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

**Shellpoint Mortgage Servicing**

Attn: Bankruptcy  
PO Box 10826  
Greenville, SC 29603-0826

**Shellpoint Mortgage Servicing**

601 Office Center Dr  
Fort Washington, PA 19034-3275

/s/ Glenn F. Russell, Jr.

Glenn F. Russell, Jr.